

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ULYSSES RODRIGUEZ CHARLES,

Plaintiff,

V.

CITY OF BOSTON, STANLEY BOGDAN
JOHN MULLIGAN, WILLIAM KEOUGH
PAUL RUFO, KATHLEEN HANLEY
JOHNSON, and JOHN DOE and JANE DOE,
supervisors in the Boston Police Department,
Defendants.

C.A. No. 04-10986-NG

**PLAINTIFF'S MOTION FOR AN ORDER COMPELLING THE
DEPOSITION OF SHANNON S. AND HOLDING HER IN CONTEMPT**

Pursuant to U.S. District Court for the District of Massachusetts Local Rule 7.1, Ulysses Rodriguez Charles ("Charles") hereby moves for an order compelling non-party witness Shannon S., one of the three sexual assault victims of the crimes underlying this case, to appear for a deposition on March 19, 2008 (or on some other date mutually agreed-to by counsel) due to her failure to obey two subpoenas duly served upon her in September 2006 and May 2007. In addition, Charles respectfully requests that, in the event Shannon fails to obey the Court's order, she be fined \$500 per day until she appears for a deposition.

Further grounds for this motion are set forth in Charles's accompanying memorandum of law, filed herewith.

A [Proposed] Order is attached hereto at Exhibit 1.

DATED: February 20, 2008
Boston, MA

Respectfully submitted,

/s/ Mayeti Gametchu
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Attorneys for Plaintiff

ULYSSES RODRIGUEZ CHARLES

RULE 7.1(A)(2) CERTIFICATE OF CONFERRAL

I, Mayeti Gametchu, hereby certify that on February 20, 2008, I conferred with counsel for Defendants in an attempt to narrow or resolve the issues raised in this motion, but was unable to do so.

/s/ Mayeti Gametchu

CERTIFICATE OF SERVICE

I, Mayeti Gametchu, hereby certify that, on February 20, 2008, this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Mayeti Gametchu